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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )

Amendment of )  
of the Commission's Rules )  
to Provide Channel Exclusivity )  
To Qualified Private Paging )  
Systems at 929-930 MHz )

PR Docket No. 93-35

RM-7986

To: The Commission

REPLY COMMENTS  
OF THE  
ASSOCIATION FOR PRIVATE CARRIER PAGING SECTION

Commission proposed certain threshold criteria to obtain exclusivity of a frequency on a nationwide, regional or local basis. For the most part, the Commission's proposal in the Notice incorporated proposals made by APCP in its Petition. However, the Commission did make some significant modifications to APCP's initial proposals.

In its Comments, APCP generally supported the Commission's proposal, except for the proposal to permit multiple frequency

~~coordination committees to coordinate multiple applications~~

commenters also urged the Commission to re-consider its decision

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the shared paging-only channels below 800 MHz. APCP shares the concerns of these parties.

Therefore, APCP requests that the Commission reconsider the Commission's decision regarding APCP's Petition for Rule Making filed in October 1991.<sup>3</sup> The Petition requested the Commission to modify its rules to require employment of terminal connection equipment or other similar methods upon recommendation of the frequency coordinator when applicants/licensees were proposing to share or are sharing a channel. APCP believed that this modification to the rules would optimize efficiency of channel sharing in these bands.

The Commission dismissed the Petition finding that a rule

~~change was not warranted because the frequency coordinator had the~~

coordinator's recommendations should be given more consideration than currently provided. Thus, APCP renews its request that the Commission consider amending its rules as requested in its prior Petition for Rule Making.

### III. CONCLUSION

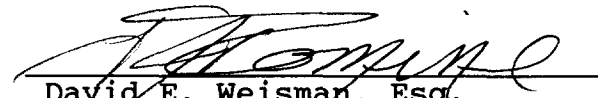
APCP urges the Commission to take action in this proceeding as soon as possible. Generally, APCP supports the Commission's proposal, except for certification of multiple coordinators, in this docket.

WHEREFORE, the Association for Private Carrier Paging Section of the National Association of Business and Educational Radio, Inc. respectfully requests the Federal Communications Commission to expeditiously take action in this proceeding.

Respectfully submitted,

ASSOCIATION FOR PRIVATE CARRIER  
PAGING

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Date: May 21, 1993